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GOVERNOR

STATE OF MICHIGAN
DEPARTMENT OF TRANSPORTATION
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KIRK T. STEUDLE
DIRECTOR

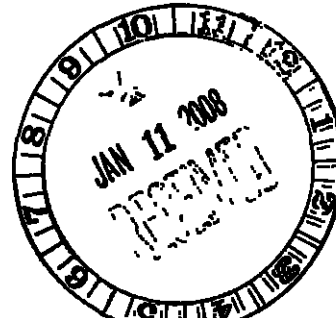
January 10, 2008

Honorable Vernon A. Williams, Secretary
Surface Transportation Board
395 East Street, SW
Washington, D.C. 20423

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Office of Proceedings

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Dear Secretary Williams

Subject: Docket No. AB364 (Sub-No. 11X), Mid-Michigan Railroad, Inc., Abandonment Exemption – in Kent and Montcalm Counties, Michigan

Thank you for the opportunity to comment on the referenced Abandonment Exemption, requested by the Mid-Michigan Railroad, Inc., located in Michigan. The Michigan Department of Transportation (MDOT) would like to offer the following comments on the accuracy of the information provided within the Docket:

- P 3 (Proposed Transaction section and other references in the document) The proposed abandonment is also located in Ionia County, as well as, Montcalm and Kent Counties.
- P 5 (Background section) Crop Production Services (CPS) in Greenville has been observed receiving rail traffic in 2007, as well as, 2006.
- P 9 (Section E – Alternative Transportation and Exhibit A map) The applicant references a non-existent state highway (M-591), and Exhibit A incorrectly shows M-91 extending south of Belding. Also, in Exhibit A, the quality of the map makes it difficult to determine if enough track remains in Lowell to serve the two active shippers there.
- P 60-71 (Exhibit 4 – Bridge Photographs and Descriptions). Since the referenced line does not cross the Grand River, it appears the bridges noted are on the Lowell to Ionia line, subsequently filed for abandonment (Sub-No. 12X), and not along the line in question. In addition, if this information was used as the basis for any of the financial analysis included in the Docket, that information is also incorrect.

MDOT is not taking a position on the petition by Mid-Michigan Railroad to abandon this rail line. However, before the Surface Transportation Board's determination is made, the information used as a basis for that determination should be accurate and corrections should be made where needed.

If you have any questions, please contact either me or Melvin G. Williams, Administrator, Freight Services and Safety Division, at 517-373-6494. Thank you for your consideration.

Sincerely,

Rob Abent, Director
Bureau of Aeronautics and Freight Services